

The Honorable Robert S. Lasnik

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

UNIVERSAL LIFE CHURCH  
MONASTERY STOREHOUSE, a  
Washington non-profit corporation,  
Plaintiff,

v.

MAURICE KING, LEWIS KING,  
GLEN YOSHIOKA, DYLAN WALL,  
SARA WHITE, and AMERICAN  
MARRIAGE MINISTRIES, a Washington  
non-profit corporation,

Defendants

AMERICAN MARRIAGE MINISTRIES, a  
Washington non-profit corporation,  
Counter-Claimant/  
Third-Party Plaintiff,

v.

UNIVERSAL LIFE CHURCH  
MONASTERY STOREHOUSE, a  
Washington non-profit corporation; and  
UNIVERSAL LIFE CHURCH  
MONASTERY STOREHOUSE, INC., a  
Washington non-profit corporation,  
Counter-Defendants/  
Third-Party Defendants.

Case No. 2:19-CV-00301-RSL

**DECLARATION OF LEWIS KING IN  
SUPPORT OF DEFENDANT AMERICAN  
MARRIAGE MINISTRIES' RESPONSE  
TO PLAINTIFF'S MOTION FOR A  
PROTECTIVE ORDER AND TO QUASH  
SUBPOENAS**

**Declaration of Lewis King in Support of Defendant  
American Marriage Ministries' Response to Plaintiff's  
Motion for Protective Order and to Quash Subpoenas  
Case No. 2:19-CV-00301-RSL**

**FOSTER GARVEY P.C.**  
1111 THIRD AVENUE, SUITE 3000  
SEATTLE, WASHINGTON 98101-3292  
PHONE (206) 447-4400 FAX (206) 447-  
9700

1 I, Lewis King, hereby declare and affirm as follows:

2 1. I am the Executive Director of American Marriage Ministries (“AMM”), a  
3 Defendant in the above-captioned matter. I have personal knowledge of the facts stated herein  
4 and am otherwise competent to make this declaration.

5 2. In the spring of 2018, I observed a decline in AMM’s number of ordinations and  
6 a sharp decline in AMM’s revenue. I also observed that around the same time, the website at  
7 the domain name americanmarriageministries.com was appearing much higher in online search  
8 results than it previously had.

9 3. AMM’s sales have suffered at least one other notable decline at a time that  
10 correlates with when the website at the domain name americanmarriageministries.com  
11 achieved prominence in online search results, in the fall of 2016.

12 4. AMM sought to counter confusion caused by Plaintiff on the  
13 americanmarriageministries.com website by creating a response site,  
14 americanmarriageministrieslegal.com, with the purpose of correcting the false impression given  
15 by the americanmarriageministries.com site as to the validity of AMM ordinations. AMM also  
16 created another site, amm-vs-ulc.com, to provide information about the differences between  
17 AMM and online ordination organizations with the “Universal Life Church” name, in an effort  
18 to combat any confusion caused by Plaintiff’s use of AMM’s name and trademark.

19 5. In the above-captioned case, AMM seeks statutory damages, presumed  
20 damages, damages from lost sales and profits, damages to compensate for reputational harm  
21 and for dilution of its brand, disgorgement of profits, and any punitive damages, trebled  
22 damages, fees or costs allowed by law.

23 6. AMM has lost sales since around 2016 because of actions taken by the  
24 Universal Life Church Monastery Storehouse, the Plaintiff in the above-captioned matter.  
25 Based on AMM’s average annual growth rate between 2011 and 2016 of \$290,894, AMM


**Declaration of Lewis King in Support of Defendant  
American Marriage Ministries’ Response to Plaintiff’s  
Motion for Protective Order and to Quash Subpoenas- 1  
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1 calculates that it lost approximately \$2,235,613 in sales for the years 2017-2019. Based on  
2 AMM's projected revenue compared to real revenue, AMM suffered an estimated loss of  
3 \$290,894 in 2017; an estimated loss of \$969,165 in 2018; and an estimated loss of \$975,554 in  
4 2019.

5 I certify under penalty of perjury under the laws of the United States that the foregoing  
6 is true and correct.

7  
8 Executed this 4th day of May, 2020 in Seattle, Washington.

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11 \_\_\_\_\_  
12 Lewis King  
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**Declaration of Lewis King in Support of Defendant  
American Marriage Ministries' Response to Plaintiff's  
Motion for Protective Order and to Quash Subpoenas- 2  
Case No. 2:19-CV-00301-RSL**

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# **CERTIFICATE OF SERVICE**

I hereby certify that on May 4th, 2020, I served a copy of the foregoing \_\_\_\_ on:

Michael P. Matesky, II Matesky Law LLC 1001 4 <sup>th</sup> Ave., Suite 3200 Seattle, WA 98154 <b>Email: litigation@mateskylaw.com</b> <i>Of Attorneys for Plaintiff</i>	Michael B. Galletch Puget Sound Business & Litigation PLLC 411 University Street, Suite 1200 Seattle, WA 98101 <b>Email: mike@psbizlit.com</b> <i>Of Attorneys for Plaintiff</i>
Anne Cohen Sheeba Roberts Betts Patterson Mines P.C. 111 SW 5 <sup>th</sup> Ave., Suite 3650 Portland, OR 97204 <b>Email: Acohen@bpmlaw.com</b> <b>sroberts@bpmlaw.com</b> <i>Of Attorneys for Maurice King, Lewis King,  Glen Yoshioka, Dylan Wall, Sarah White and  American Marriage Ministries</i>	

  X   by mailing to each of the foregoing a copy thereof, placed in a sealed envelope addressed as listed above and deposited in the United States mail at Seattle, Washington, and that postage thereon was fully prepaid.

\_\_\_\_\_ by facsimile transmission to the number shown above.

kel

  X   by additional e-service through the E-Filing system, if party was registered.

  X   by courtesy email to the email addresses shown above.

DATED this 4th day of May, 2020.

McKenna Filler

McKenna Filler, Legal Practice Assistant

**Declaration of Lewis King in Support of Defendant  
American Marriage Ministries' Response to Plaintiff's  
Motion for Protective Order and to Quash Subpoenas- 3  
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